33. On July 20, 2005, Pfizer issued a press release reporting the Company's financial results for the second quarter of 2005. That release reported Geodon sales of $145 million, Lyrica sales of $38 million, and Zyvox sales of $153 million.

34. On July 20, 2005, on the Company's second quarter 2005 earnings conference call, defendants made or permitted other Pfizer employees to make the following statements:

> [Katen:] The highlights of the first half include Lyrica launch. Lyrica received FDA approval, as you know, for adjunctive therapy for adults with partial onset seizures – epilepsy. And that expands on its approval for the two most common forms of neuropathic pain. So we will have – so potentially we have 3 million patients in the U.S. who could benefit from this medicine.
>
> We expect to launch Lyrica in the U.S. as soon as the final DEA scheduling is received. We have not received it yet, although we expect it will be a 5 – category 5. And it will build on the recent success we've experienced in virtually every other market where the product has been launched – UK, Germany, Mexico – spectacular launch experiences. I just was in Spain and they again have had an incredibly powerful launch of the product in that market. So, these are very, very good, sterling examples, and the U.S., I'm sure, will follow.

35. On August 8, 2005, Pfizer filed a Form 10-Q with the SEC setting forth the drug sales described in the July 20, 2005 release. The Form 10-Q was accompanied by certifications signed by defendants McKinnell and Levin substantially identical to those quoted above.

36. On September 21, 2005, the Company issued a press release entitled "Pfizer's Lyrica Now Available for Patients," which stated in part:

> Pfizer Inc announced today that Lyrica® (pregabalin) capsules c-v, a new prescription medication for the management of neuropathic pain associated with diabetic peripheral neuropathy (DPN), postherpetic neuralgia (PHN) and adjunctive treatment of partial onset seizures in adults with epilepsy, is now available in U.S. pharmacies.

37. On October 20, 2005, Pfizer issued a press release reporting the Company's financial results for the third quarter of 2005. That release reported Geodon sales of $148 million, Lyrica sales of $80 million, and Zyvox sales of $157 million.

38. On October 20, 2005, on the Company's third quarter 2005 earnings conference call, defendants made or permitted Pfizer employees to make the following statements:

> [Katen:] In September, we launched Lyrica in the U.S., Canada, and Italy. It's already been one of the most successful launches ever in Europe. Lyrica is the first new medicine in recent years for epilepsy and two of the most common forms of neuropathic pain. And in its first two weeks in the U.S., it was the most frequently detailed product among high-writing primary care physicians.
>
> * * *
>
> [McKinnell]: If we take a ruler and put on these two weeks of Lyrica, we'll own the world.

39. On November 9, 2005, Pfizer filed a Form 10-Q with the SEC setting forth the drug sales described in the October 20, 2005 release. The Form 10-Q was accompanied by certifications signed by defendants McKinnell and Levin substantially identical to those quoted above.

FALSE AND MISLEADING STATEMENTS DURING THE CLASS PERIOD

40. On January 19, 2006, Pfizer issued a press release reporting the Company's financial results for the fourth quarter and full year 2005. That release reported Geodon sales of $159 million for the quarter and $589 million for the year; Lyrica sales of $153 million for the quarter and $291 million for the year; and Zyvox sales of $164 million for the quarter and $618 million for the year.

41. On January 19, 2006, on the Company's fourth quarter 2005 earnings conference call, defendants made or permitted Pfizer employees to make the following statements:

> [Robert Hazlett – SunTrust Robinson Humphrey – Analyst:] Regarding Lyrica – a couple of product questions I guess – Lyrica, a solid launch is underway there. We have seen a fairly significant amount of journal advertising focused on the pain indication. Can you give us breakdown of its use epilepsy versus pain if you can?
>
> * * *
>
> [Pat Kelly ("Kelly"), President of Pfizer U.S. Pharmaceuticals:] On Lyrica it is important to note that the epilepsy market and the neuropathic pain market are quite different in size. The epilepsy market, while very important from a medical need

point of view, is quite small because there are not that many epileptic patients. However, there are an extraordinary number of patients with neuropathic pain, and many of which are not satisfied with the pain relief they are currently receiving. And thus have been responsible for a lot of the rapid uptake in Lyrica, because of the strong clinical benefit the product provides. Again it is an unfair comparison to ask which is contributing more. Pain will always contribute more because it is a much larger market.

42. On February 10, 2006, at the Pfizer Analyst Meeting, defendants made or permitted Pfizer employees to make the following statements:

[Shedlarz:] We launched four new products in the U.S., capped by the very successful launch of Lyrica.

* * *

[Kelly:] Now I'd like to highlight another fast-growing Pfizer product with plenty of growth potential left – Geodon. Geodon is approved in 81 countries for schizophrenia and 36 countries for bipolar mania, and in the U.S., it is performing quite well – 23% growth in total prescriptions over 2004 versus 4% growth in the market. In the U.S., market potential, as you can see, is quite large. Geodon is also outpacing market growth in all other regions worldwide.

* * *

To accelerate Geodon growth, we're encouraging psychiatrists to put on their white coats again and seek a treatment that allows them to optimize total patient outcomes. This is especially important in the schizophrenia population, which has a higher rate of metabolic syndrome than the general population. Geodon is uniquely suited to meet this need with a balance of powerful efficacy and the best metabolic profile in its class.

* * *

We believe Geodon has room to grow even further because of an expansive clinical development program, a winning product profile and statements like this from Dr. [Steven Saul] at UCSD. Quote – the atypical that will be used the most will be the one whose efficacy is robust, dosing is clear, has evident mood-enhancing effects and whose side effects do not include sedation or weight gain. We believe the answer to Dr. Saul's question is Geodon.

* * *

Lyrica speaks for itself, and its early performance show[s] that patients and physicians are clearly listening. The strong launch of Lyrica in the U.S. echoes its earlier strong launches in the EU. Weekly new and total prescription rates are soaring, as is our market share.

Physicians understand the value of Lyrica, as their prescribing rates in the U.S. show. When writing a new prescription for DPN or PHN, two of the most common forms of neuropathic pain, both primary care docs and neurologists are selecting Lyrica over all other agents.

Physicians are prescribing Lyrica because of the positive experience patients who use it are having. The anecdotal response has been extraordinarily encouraging. Physicians say things like, within 24 hours, the patient called me to say her pain had been reduced by 75%. Or, this is the first time the patient has been comfortable in years. In our surveys of doctors, 70% cite rapid pain relief as the primary attribute they associate with Lyrica.

Across primary care physicians and neurologists, almost 80% of prescriptions for Lyrica are being written for doses greater than or equal to 150 mg a day, with the majority of that does [sic] DID. The average daily dose for all uses is 183 mg per day. Doctors generally view Lyrica as quite easy to dose, particularly as compared to gabapentin. One neurologist told us, with Neurontin, you'd have to push the dose. But with Lyrica, everyone is on 150 or 300 mg with pain relief.

* * *

[Katen:] We expect sales of Geodon to grow to $800 million and sales of the recently launched Lyrica to nearly triple to $900 million.

43. On March 1, 2006, Pfizer filed a Form 10-K with the SEC setting forth the drug sales described in the January 19, 2006 release. The Form 10-K was accompanied by certifications signed by defendants McKinnell and Levin substantially identical to those quoted above.

44. The 10-K also stated:

Legal Proceedings

We and certain of our subsidiaries are involved in various patent, product liability, consumer, commercial, securities, environmental and tax litigations and claims; government investigations; and other legal proceedings that arise from time to time in the ordinary course of our business. Litigation is inherently unpredictable, and excessive verdicts do occur. Although we believe we have substantial defenses in these matters, we could in the future incur judgments or enter into settlements of claims that could have a material adverse effect on our results of operations in any particular period.

* * *

Contingencies

We and certain of our subsidiaries are involved in various patent, product liability, consumer, commercial, securities, environmental and tax litigations and claims; government investigations; and other legal proceedings that arise from time to time in the ordinary course of our business. We record accruals for such contingencies to the extent that we conclude their occurrence is probable and the related damages are estimable.

* * *

Legal Proceedings and Contingencies

We and certain of our subsidiaries are involved in various patent, product liability consumer, commercial, securities, environmental and tax litigations and claims; government investigations; and other legal proceedings that arise from time to time in the ordinary course of our business. We do not believe any of them will have a material adverse effect on our financial position.

* * *

F. Government Investigations and Requests for Information

* * *

We received requests for information and documents from the Department of Justice in 2003 concerning the marketing of Genotropin as well as certain managed care payments, and in 2005 concerning certain physician payments budgeted to our prescription pharmaceutical products.

In 2003 and 2004, we receive requests for information and documents concerning the marketing and safety of Bextra and Celebrex from the Department of Justice and a group of state attorneys general. In 2005, we received a similar request from the staff of the Securities and Exchange Commission.

45. On April 19, 2006, Pfizer issued a press release reporting the Company's financial results for the first quarter of 2006. That release reported Lyrica sales of $192 million, Geodon sales of $182 million, and Zyvox sales of $186 million.

46. On April 19, 2006, on the Company's first quarter 2006 earnings conference call, defendants made or permitted Pfizer employees to make the following statements:

[McKinnell:] Lyrica continued to deliver exceptional results, and we now expect Lyrica to achieve $900 million or more in sales this year.

* * *

[Chris Schott – Banc of America – Analyst:] And the second question is on Lyrica, in terms of the uptick we're seeing for that product. Can you just kind of walk-through within the different indications where you are seeing kind of the greatest traction thus far?

* * *

[Katen:] On Lyrica, as you point out, it has had extraordinarily successful launches in every market it's been introduced. . . . [M]ore than 1 million patients have now been prescribed Lyrica since we launched it. The market share in the US is growing nicely. It's the agent of choice already for diabetic peripheral neuropathy and postherpetic neuralgia. So it has great acceptance in the primary care marketplace. We also have seen that market, DPN/PHN, grow by 21% in terms of new prescriptions during the first three months following the Lyrica launch. So it has created market for these patients and, as a result, has grown substantially.

* * *

[McKinnell:] One of the most successful launches ever.

* * *

[Jami Rubin – Morgan Stanley – Analyst:] On Geodon, I was wondering if there was a dual eligible benefit that you could help to quantify this quarter, because sales do look to have accelerated from sequential quarters.

* * *

[Joe Feczko, Pfizer President, Worldwide Development:] I think people are getting more comfortable with the safety profile of Geodon and are pushing the dose higher. We have always been hampered a little bit, I think, with the initial label and the fear of QTc changes, so there was a dose titration. And we knew also from our clinical studies that there was much better efficacy at the higher doses than the lower doses. And so I think psychiatrists are just getting more comfortable pushing the dose higher.

47. On May 2, 2006, at the Deutsche Bank Securities 31st Annual Healthcare Conference, defendant Shedlarz made the following statements:

Key products such as Lyrica, Celebrex, and Geodon contributed strong revenue growth during the first quarter. New products like Lyrica are increasingly compensating for revenues lost to patent expirations and loss of marketing exclusivity.

* * *

> The performance of our key in-line products including Lipitor, Celebrex, Lyrica, and Geodon will continue to drive overall performance. . . . With Lyrica being one of the most successful pharmaceutical launches ever, we now expect Lyrica to achieve full-year revenues of at least $900 million.
>
> We expect full-year 2006 Geodon revenues of about $800 million. Geodon's strong performance is due to the improved perception among clinicians of its efficacy, increased benefits for optimal dosing and its favorable metabolic profile. Geodon is uniquely positioned to allow physicians to treat mental health with the body and mind.

48. On May 8, 2006, Pfizer filed a Form 10-Q with the SEC setting forth the drug sales described in the April 19, 2006 release. The Form 10-Q was accompanied by certifications signed by defendants McKinnell and Levin substantially identical to those quoted above.

49. On July 20, 2006, Pfizer issued a press release reporting the Company's financial results for the second quarter of 2006. That release reported Lyrica sales of $271 million, Geodon sales of $165 million, and Zyvox sales of $167 million.

50. On July 20, 2006, on the Company's second quarter 2006 earnings conference call, defendants made or permitted Pfizer employees to make the following statement:

> [Katen:] Lyrica has been very well-received by both physicians and patients, because of its ability to relieve debilitating neuropathic pain. We have received countless letters from patients and physicians expressing their appreciation for this great medicine. We believe those patients are also sharing their positive experiences with each other, and their word of mouth is helping to drive Lyrica's success.

51. On August 11, 2006, Pfizer filed a Form 10-Q with the SEC setting forth the drug sales described in the July 20, 2006 release. The Form 10-Q was accompanied by certifications signed by defendants Kindler and Levin substantially identical to those quoted above.

52. On October 19, 2006, Pfizer issued a press release reporting the Company's financial results for the third quarter of 2006. That release reported Lyrica sales of $340 million, Geodon sales of $201 million, and Zyvox sales of $206 million.

53. On October 19, 2006, on the Company's third quarter 2006 earnings conference call, defendant Shedlarz made the following statement:

Lyrica worldwide sales reached $340 million in the third quarter.

54. On November 3, 2006, Pfizer filed a Form 10-Q with the SEC setting forth the drug sales described in the October 19, 2006 release. The Form 10-Q was accompanied by certifications signed by defendants Kindler and Levin substantially identical to those quoted above.

55. On January 22, 2007, Pfizer issued a press release reporting the Company's financial results for the fourth quarter and full year 2006. That release reported Lyrica sales of $353 million for the quarter and more than $1.1 billion for the year; Geodon sales of $210 million for the quarter and $758 million for the year; and Zyvox sales of $223 million for the quarter and $782 million for the year.

56. On January 22, 2007, at the Pfizer Analyst Meeting, defendant Read made the following statements:

> Lyrica's launch has gone extremely well, and with excellent feedback from both patients and physicians, we have an exciting new marketing initiative aimed at improving the appropriate diagnosis of patients, and we are optimistic about the potential new indication for fibromyalgia.
>
> Another drug, Geodon, is a quiet but impressive success story. It is now the fastest-growing atypical agent in the US, and I will give you an update on what is driving this.
>
> * * *
>
> Finally, we are preparing for an exciting, potentially new indication [for Lyrica], fibromyalgia. But first let's talk about improving growth in our core indications as the data on this slide supports. 73% of general practitioners are extremely satisfied with Lyrica versus less than half for gabapentin. In addition, almost 80% of physicians in our market research said they would increase prescriptions of Lyrica versus only 10% for gabapentin.
>
> * * *

Let's now look at Geodon, a growing success story. Geodon's 2006 sales of over $600 million and a growth of 31% is a clear sign that the atypical antipsychotic market is changing. With the publication of the landmark CATIE study last year, focus on the metabolic profiles of these agents has intensified. More and more, psychiatrists are recognizing that they need to treat with the body in mind.

This fact is underscored as they realize the consequence of this metabolic imbalance. Patients with serious mental health die on average 30 years before the natural population. Better understanding of Geodon's dosing, as well as its superior metabolic profile, has made Geodon the fastest-growing atypical medicine in the US market.

This growth is being fueled by the results of the major NIMH CATIE study, which showed Geodon to have a benign metabolic profile. Patients who took Geodon were the only, the only patients who had a reversal of all metabolic parameters – triglycerides, weight and total cholesterol.

Pfizer has led the charge through its "Know the Facts," a national screening campaign across the US focused on 30,000 patients with mental illness. This campaign highlights the fact that patients with schizophrenia have four times the rate of diabetes as established in the CATIE study. 41% have metabolic syndrome. This program and the favorable market dynamics highlights the growth potential for Geodon.

57. On March 1, 2007, Pfizer filed a Form 10-K with the SEC setting forth the drug sales described in the January 22, 2007 release. The Form 10-K was accompanied by certifications signed by defendants Kindler and Levin substantially identical to those quoted above.

58. The 10-K also stated:

Legal Proceedings

We and certain of our subsidiaries are involved in various patent, product liability, consumer, commercial, securities, environmental and tax litigations and claims, government investigations, and other legal proceedings that arise from time to time in the ordinary course of our business. Litigation is inherently unpredictable, and excessive verdicts do occur. Although we believe we have substantial defenses in these matters, we could in the future incur judgments or enter into settlements of claims that could have a material adverse effect on our results of operations in any particular period.

* * *

Contingencies

We and certain of our subsidiaries are involved in various patent, product liability, consumer, commercial, securities, environmental and tax litigations and claims; government investigations; and other legal proceedings that arise from time to time in the ordinary course of our business. We record accruals for such contingencies to the extent that we conclude their occurrence is probable and the related damages are estimable.

* * *

Legal Proceedings and Contingencies

We and certain of our subsidiaries are involved in various patent, product liability, consumer, commercial, securities, environmental and tax litigations and claims; government investigations; and other legal proceedings that arise from time to time in the ordinary course of our business. We do not believe any of them will have a material adverse effect on our financial position.

* * *

F. Government Investigations and Requests for Information

Like other pharmaceutical companies, we are subject to extensive regulation by national, state and local government agencies in the U.S. and in the other countries in which we operate. As a result, we have interactions with government agencies on an ongoing basis. Among the investigations and requests for information by government agencies are those discussed below. It is possible that criminal charges and fines and/or civil penalties could result from pending government investigations.

* * *

Since 2003, we have received requests for information and documents concerning the marketing and safety of Bextra and Celebrex from the Department of Justice and a group of state attorneys general. We have been considering various ways to resolve these matters.

Since 2005, we have received requests for information and documents from the Department of Justice concerning certain physician payments budgeted to our prescription pharmaceutical products.

59. On April 20, 2007, Pfizer issued a press release reporting the Company's first quarter 2007 financial performance. That release reported Lyrica sales of $395 million, representing growth